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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF SARA JENKINS IN
SUPPORT OF GOOGLE LLC'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR ADMINISTRATIVE
RELIEF REGARDING RULE 30(b)(6)
DEPOSITIONS OF GOOGLE**

Referral: Hon. Susan van Keulen, USMJ

1 I, Sara Jenkins, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 7-11, I submit this declaration in support of Google’s
7 Opposition to Plaintiffs’ Motion for Administrative Relief Regarding Rule 30(b)(6) Depositions of
8 Google.

9 3. On December 3, 2021, Plaintiffs served three 30(b)(6) depositions notices,
10 containing 47 separate topics. Plaintiffs first emailed counsel for Google on December 16 to request
11 a meet and confer regarding these 30(b)(6) topics, and requested that the meet and confer take place
12 on either December 17, 2021 or December 20, 2021. Counsel for Google was not available on those
13 days, but proposed a meet and confer for December 22, which Plaintiffs accepted.

14 4. On December 22, 2021, Google’s counsel met and conferred with counsel for
15 Plaintiffs for more than one and a half hours regarding Plaintiffs’ 30(b)(6) notices and topics. The
16 parties discussed each of the 47 topics, one-by-one, with Google’s counsel explaining its objections,
17 telling Plaintiffs which topics it was likely to agree to designate a witness on and to which topics
18 Google would be objecting, and asking questions about topics that were unclear. Google also asked
19 Plaintiffs’ counsel about Plaintiffs’ willingness to narrow certain topics in response to Google’s
20 objections.

21 5. On January 11, 2022 at 11:29 A.M., PST, Plaintiffs, for the first time, proposed a
22 schedule by which Google would provide formal objections and the names of its 30(b)(6) designees.
23 Plaintiffs filed this administrative motion for relief just six and a half hours later, without meeting
24 and conferring regarding Plaintiffs’ proposed schedule.

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct. Executed in Redwood Shores, California on January 12, 2022.

3
4 DATED: January 12, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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6
7 By /s/ Sara Jenkins

Sara Jenkins

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9 *Attorney for Defendant*
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